## In the Supreme Court of the United States

STATE OF CONNECTICUT, Petitioner,

v.

MICHAEL SKAKEL, Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioner for the State of Connecticut v. Michael Skakel contains 2,779 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2018.

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